

**FEDERAL MARITIME COMMISSION**

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**DOCKET NO. 14-04**

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**EDAF ANTILLAS, INC.**

**v.**

**CROWLEY CARIBBEAN LOGISTICS, LLC;  
IFS INTERNATIONAL FORWARDING, S.L.; and  
IFS NEUTRAL MARITIME SERVICES**

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**RESPONDENT CROWLEY CARIBBEAN LOGISTICS, LLC'S SUPPLEMENT TO ITS  
MOTION TO STAY ORDER ON MOTIONS TO DISMISS**

On Friday afternoon, November 21, 2014, Crowley Caribbean Logistics, LLC's ("CCL") Motion for a Stay pending reconsideration crossed paths with the Order of the Presiding Judge on the IFS motion for extension of time to appeal. CCL submits this brief supplement to explain why a stay remains the appropriate course to avoid piecemeal litigation in different forums.

1. As we understand the state of play, Edaf Antillas, Inc.'s ("Edaf") exceptions to the November 6, 2014 Order on Motions to Dismiss remain due on November 28. Grant of the motion for reconsideration would then potentially require Edaf to file a second set of exceptions. Even assuming the Commissioners were to consolidate the two appeals, the ill effect is obvious – and avoidable by the requested stay.

2. Absent a stay, Edaf and CCL would be required to litigate simultaneously before both the Presiding Judge and the Commission. Edaf would need to file both (i) a reply to CCL's Motion for Reconsideration pending before the Presiding Judge and (ii) exceptions with the Commission. CCL, in turn, would need to respond to each.

For the foregoing reasons, a stay of the November 6, 2014 Order is appropriate to provide an orderly and efficient procedure.

Dated: November 24, 2014

Respectfully submitted,

BY:   
ERIC C. JEFFREY

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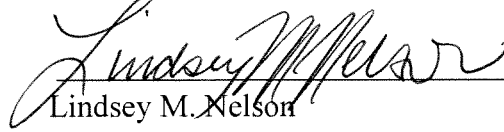
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Counsel for Crowley Caribbean Logistics, LLC

*Certificate of Service*

I hereby certify that I have this day served the foregoing document upon all parties of record by e-mailing a copy to each person.<sup>1</sup>

Dated at Washington, DC, this 24th day of November 2014.

A handwritten signature in black ink, appearing to read "Lindsey M. Nelson", is written over a horizontal line.

Lindsey M. Nelson

Counsel for Crowley Caribbean Logistics, LLC

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<sup>1</sup> The Parties agreed in the August 11, 2014 Joint Status Report that service among them would be effectuated by email, to reduce both delays and costs.